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Attorneys for Defendant  
 COUNTY OF SANTA CLARA

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

JANE DOE, individually and on behalf of others  
 similarly situated,

Plaintiff,

v.

THE COUNTY OF SANTA CLARA d/b/a  
 SANTA CLARA VALLEY MEDICAL  
 CENTER,

Defendant.

No. 23-CV-04411 WHO

**JOINT STIPULATION FOR EXTENSION  
 OF TIME FOR FILING RESPONSE AND  
 REPLY BRIEFS REGARDING  
 DEFENDANT COUNTY OF SANTA  
 CLARA'S MOTION TO DISMISS**

Date: Oct. 30, 2024  
 Time: 2:00 pm  
 Crtrm: 2, 17th Floor  
 Judge: The Hon. William H. Orrick

Pursuant to Civil Local Rules 6-1, 6-2, and 7-12, Plaintiff Jane Doe (“Plaintiff”) and Defendant County of Santa Clara (“Defendant”), by and through their respective counsel of record, hereby stipulate as follows.

WHEREAS Defendant filed a Motion to Dismiss (ECF No. 69) and Request for Judicial Notice (ECF No. 70) on August 30, 2024;

WHEREAS Plaintiff’s Response to Defendant’s Motion to Dismiss and Request for Judicial Notice is currently due on September 13, 2024;

WHEREAS Defendant’s Reply in Support of its Motion to Dismiss and Request for Judicial Notice is currently due seven days after the Response;

WHEREAS because of counsel’s other work obligations, vacation, and other scheduling conflicts, counsel have agreed to a one-week extension of both the Response and Reply deadlines;

WHEREAS the proposed extensions will not alter the hearing scheduled on the Motion to Dismiss and Request for Judicial Notice for October 30, 2024;

NOW, THEREFORE, the parties agree and jointly request that the Court order as follows:

1. Plaintiff shall Respond to Defendant’s Motion to Dismiss and Request for Judicial Notice no later than September 20, 2024;
2. Defendant shall file any Reply in Support of its Motion to Dismiss and Request for Judicial Notice no later than October 4, 2024; and
3. The Hearing on Defendant’s Motion to Dismiss and Request for Judicial Notice shall remain scheduled for October 30, 2024.

Dated: September 6, 2024

Respectfully submitted,

By: /s/ Michael A. Caddell

MICHAEL A. CADDELL  
CYNTHIA B. CHAPMAN  
AMY E. TABOR  
CADDELL & CHAPMAN

Attorneys for Plaintiff JANE DOE

1 Dated: September 6, 2024

By: /s/ Xavier M. Brandwajn

2 TONY LOPRESTI  
3 COUNTY COUNSEL  
4 XAVIER M. BRANDWAJN  
5 JOSÉ L. MARTIN  
6 Deputy County Counsel

Attorneys for Defendant  
COUNTY OF SANTA CLARA

7 **CERTIFICATION**

8 Pursuant to Civil Local Rule 5-1(i)(3), I attest that the concurrence of Xavier Brandwajn in  
9 the filing of this stipulation has been obtained.

10 /s/ Amy E. Tabor

11 Amy E. Tabor

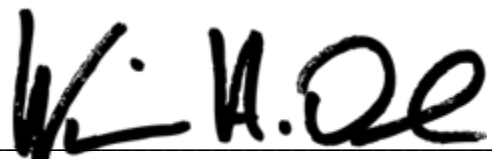
12 **PURSUANT TO STIPULATION, IT IS HEREBY ORDERED** that:

13 1. Plaintiff shall Respond to Defendant's Motion to Dismiss and Request for Judicial  
14 Notice no later than September 20, 2024.

15 2. Defendant shall file any Reply in Support of its Motion to Dismiss and Request for  
16 Judicial Notice no later than October 4, 2024.

17 3. The Hearing currently scheduled for October 30, 2024 remains scheduled at 2:00 p.m.

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20 Dated: September 6, 2024



21 THE HONORABLE WILLIAM H. ORRICK  
22 Senior U.S. District Court Judge  
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